18-23538-shl Doc 4347 Filed 06/24/19 Entered 06/24/19 15:21:26 Main Document Pg 1 of 3

Hearing Date: July 11, 2019 at 10:00 a.m. Objection Deadline: July 3, 2019 at 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK	
In re:	Chapter 11
SEARS HOLDING CORPORATION, et al.	Case No. 18-23538 (RDD)
Debtors. ¹	(Jointly Administered)

NOTICE OF HEARING ON APPLICATION OF TEAM WORLDWIDE CORPORATION, A CREDITOR, FOR ENTRY OF AN ORDER PURSUANT TO RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE REQUIRING THE PRODUCTION OF DOCUMENTS BY AND AN EXAMINATION OF THE DEBTORS

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that on June 24, 2019, Team Worldwide Corporation ("Team Worldwide") filed the Application of Team Worldwide Corporation, a Creditor, for Entry of an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedures Requiring the Production of Documents By and an Examination of the Debtors (the "Application").

PLEASE TAKE FURTHER NOTICE that a hearing on the Application will be held at the Omnibus Hearing Date, July 11, 2019 at 10:00 a.m. (E.T.) or as soon thereafter as counsel may be heard before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601 (the "Court").

PLEASE TAKE FURTHER NOTICE, that any objections (the "Objections") to the Application shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served (i) on counsel to Team Worldwide, and (ii) in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures* (ECF Doc. No. 405), so as to be filed and received no later than July 3, 2019 at 4:00 p.m. (E.T.).

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than the filing of a notice on the Court's electronic docket for these cases or the announcement of such adjournment in open Court.

Dated: June 24, 2019 New York, New York

DIAMOND MCCARTHY LLP

By: <u>s/Sheryl P. Giugliano</u>
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